

Petitioner Jonathan Kaplan, resident of 15 18<sup>th</sup> Avenue #8, Venice, CA 90291 and served by the Venice, California Main Post Office (the “VMPO”) hereby petitions the Postal Regulatory Commission, pursuant to 39 C.F.R. § 3001.111, for review of the September 23, 2011, decision by the United States Postal Service (“USPS”) to close the historic structure presently housing the VMPO at 1601 Main Street (hereinafter the “Closure Decision”), made by way of the Final Decision Regarding Relocation of Retail Services in Venice, California dated September 23, 2011, and signed by David E. Williams, Vice President of Network Operations for the USPS.

The petition is made on the ground that the Closure Decision improperly describes the closure as a “relocation” of a customer service facility to another existing building, namely, the Venice Carrier Annex at 313 Grand Boulevard, when in fact it would result in the elimination of a large retail post office with five customer windows and the establishment in its place of a much smaller retail operation with no more than two customer windows, ancillary to the Venice Carrier Annex.

This dramatic decrease in the size of the VMPO simultaneous with its purported “relocation” means that in fact, the action is the functional equivalent of a closure – or at least a partial closure – of the VMPO. Thus, the decision should be, and is, subject to all procedures and considerations associated with a closure under 39 U.S.C. § 404(b) and 39 C.F.R. § 241.3, including an appeal to this Commission.

Petitioner therefore requests that the Commission reverse the Closure Decision and return the matter to the Postal Service for further consideration. In addition, based upon the foregoing facts Petitioner applies pursuant to 39 C.F.R. § 3001.114 for an order suspending the effectiveness of the Closure Decision pending the outcome of this appeal.